

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Shell Chemical Company	AI #:	1136	TEMPO Activity No:	PER20050032
Facility Name:	PDO-1 Unit	Remarks Submitted by:	June 5, 2007		
Permit Writer:	DAN NGUYEN	Permit Writer Email address:	DAN.NGUYEN@LA.GOV		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – *DO NOT COMPLETE THIS SECTION.* This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks				Air Permits Division Response (for official use only)
Air Permit Briefing Sheet – III. Description	Revise NO _x and CO emission rates as shown below.				The draft permit is revised
	Pollutant	Before	After	Change	
	NO _x	94.42	19.66	-74.76	
	CO	134.30	89.90	-44.40	
	Note: These revised emission rates reflect the use of the BACT determined factors for NO _x and CO as determined for the 1997 permit.				
Air Permit Briefing Sheet – IV. Type of Review	Revise second sentence (strickethrough = delete, underline = add): NO _x and CO emissions from several <u>14</u> emission points increased more than the limits of Permit PSD-1A-611.				The draft permit is revised
Air Permit Briefing Sheet – IV. Type of Review	Revise third sentence (strickethrough = delete, underline = add): These emissions were reviewed under the PSD regulations and documented in Permit PSD-1A-611 (M1).				The draft permit is revised

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet – X. Applicable Louisiana and Federal Air Quality Requirements	EQT614 (10-97 – PDO HES Tops Storage Tank, T-PD1913 Fixed) – List “3” under 2103 as TVP is less than threshold	The draft permit is revised.
Air Permit Briefing Sheet – X. Applicable Louisiana and Federal Air Quality Requirements	EQT614 (10-97 – PDO HES Tops Storage Tank, T-PD1913 Fixed) – List “3” under NSPS Kb as TVP is less than threshold	The draft permit is revised
Air Permit Briefing Sheet – X. Applicable Louisiana and Federal Air Quality Requirements	EQT626 (101-00 – PDO Railcar Loading) – List “1” under NESHAP Subpart FFFF as the source is a Group 2 transfer rack	The draft permit is revised
Air Permit Briefing Sheet – X. Applicable Louisiana and Federal Air Quality Requirements	FUG017 (01-97 – PDO Fugitive Emissions) – List “1” under NESHAP Subpart G (HON G) as the PDO-1 Unit complies with the HON for fugitive sources	The draft permit is revised.
Inventories - Relationships	Add: <ul style="list-style-type: none"> • Subject Item: 15-97 (NO EQT#) PDO Vacuum System Effluent, T-PD1504 • Relationship: Vents to • Subject Item: Process 	The draft permit is revised
Emission Rates For Criteria Pollutants	Revise Rates for EQT616 (14A-97) <ul style="list-style-type: none"> • NO_x <ul style="list-style-type: none"> ○ Avg: 1,900 lbs/hr ○ Max: 1,900 lbs/hr ○ Annual: 0.95 TPY • CO <ul style="list-style-type: none"> ○ Avg: 2,388 lbs/hr ○ Max: 2,388 lbs/hr ○ Annual: 1.17 TPY Note: These revised emissions reflect the use of the BACT emission factors determined in the 1997 permit and increase in potential operating hours to 1,000 hrs/yr.	The draft permit is revised.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates For Criteria Pollutants	<p>Revise Rates for EQT620 (35A-97)</p> <ul style="list-style-type: none"> • NO_x <ul style="list-style-type: none"> ○ Avg: 4.940 lbs/hr ○ Max: 4.940 lbs/hr ○ Annual: 2.47 TPY • CO <ul style="list-style-type: none"> ○ Avg: 6.078 lbs/hr ○ Max: 6.078 lbs/hr ○ Annual: 3.04 TPY <p>Note: These revised emissions reflect the use of the BACT emission factors determined in the 1997 permit and increase in potential operating hours to 1,000 hrs/yr.</p>	The draft permit is revised
Emission Rates For Criteria Pollutants	<p>Revise Rates for EQT625 (92A-97)</p> <ul style="list-style-type: none"> • NO_x <ul style="list-style-type: none"> ○ Avg: 6.308 lbs/hr ○ Max: 6.308 lbs/hr ○ Annual: 3.15 TPY • CO <ul style="list-style-type: none"> ○ Avg: 7.761 lbs/hr ○ Max: 7.761 lbs/hr ○ Annual: 3.88 TPY <p>Note: These revised emissions reflect the use of the BACT emission factors determined in the 1997 permit and increase in potential operating hours to 1,000 hrs/yr.</p>	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants	<p>EQT620 (35A-97)</p> <ul style="list-style-type: none"> • Acetaldehyde <ul style="list-style-type: none"> ○ Avg: 0.002 lbs/hr ○ Max: 0.002 lbs/hr 	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants	<p>EQT621 (36A-97)</p> <ul style="list-style-type: none"> • Acrolein <ul style="list-style-type: none"> ○ Avg: 0.004 lbs/hr ○ Max: 0.031 lbs/hr 	The draft permit is revised
Specific Requirements – GRP022	<p>Line 120 – It is our understanding that LDEQ has withdrawn proposed changes to OS71 on March 29, 2007 that requires exceedences of the Air Toxics MERS to be reported under the release reporting requirements in LAC 33:1.Chapter 39. LDEQ plans to propose revisions to Chapter 39 in a separate rule-making (OS78) soon.</p> <p>If true, Shell requests this specific condition be removed.</p>	The draft permit is revised

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Statement of Basis – II. Facility and Current Permit Status	Add to table: <ul style="list-style-type: none">• Permit Number: PSD-LA-611(M1)• Units or Sources: Polymers Complex (PDO-1 Unit)• Date Issued: Pending	The draft statement of basis is revised																								
Statement of Basis – III. Proposed Permit/ Project Information – Permitted Air Emissions (tons/year)	Revise Table as shown below: <table><tr><th>Pollutant</th><th>Before</th><th>After</th><th>Change</th></tr><tr><td>PM₁₀</td><td>12.75</td><td>14.22</td><td>+1.47</td></tr><tr><td>SO₂</td><td>1.12</td><td>0.95</td><td>-0.17</td></tr><tr><td>NO_x</td><td>94.42</td><td>19.66</td><td>-74.76</td></tr><tr><td>CO</td><td>134.30</td><td>89.90</td><td>-44.40</td></tr><tr><td>VOC</td><td>103.96</td><td>42.78</td><td>-61.18</td></tr></table>	Pollutant	Before	After	Change	PM ₁₀	12.75	14.22	+1.47	SO ₂	1.12	0.95	-0.17	NO _x	94.42	19.66	-74.76	CO	134.30	89.90	-44.40	VOC	103.96	42.78	-61.18	The draft statement of basis is revised
Pollutant	Before	After	Change																							
PM ₁₀	12.75	14.22	+1.47																							
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VOC	103.96	42.78	-61.18																							
Statement of Basis – III. Proposed Permit/ Project Information – Prevention of Significant Deterioration (PSD) Applicability	Revise first sentence (strikethrough = delete, underline = add): NO _x and CO emissions from several <u>several</u> emission points increased more than the limits of Permit PSD-LA-611.	The draft statement of basis is revised																								
Statement of Basis – III. Proposed Permit/ Project Information – Air Modeling Analysis	There is no incinerator associated with PDO-1 Unit. Recommend removing sentence.	The draft statement of basis is revised																								
Statement of Basis – III. Proposed Permit/ Project Information – Insignificant Activities	Second Sentence – Suggest removing as it seems out of place.	The draft statement of basis is revised																								
Statement of Basis – III. Proposed Permit/ Project Information – Insignificant Activities	Third (Last) Sentence – Suggest removing as the same statement is provided below under V. Periodic Monitoring, which appears to be the appropriate place for the statement.	The draft statement of basis is revised																								